

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 3

v.

18 U.S.C. § 844(c)

JOSE A. FELAN, JR., and
MENA D. YOUSIF,

18 U.S.C. § 844(i)

18 U.S.C. § 853(p)

18 U.S.C. § 982(a)(2)(B)

18 U.S.C. § 982(b)(1)

28 U.S.C. § 2461(c)

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Arson)

On or about May 28, 2020, in the State and District of Minnesota, the
defendant,

JOSE A. FELAN, JR.,

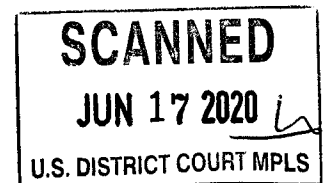
maliciously damaged and destroyed, and attempted to damage and destroy, by means
of fire, a building used in interstate or foreign commerce and in activity affecting
interstate or foreign commerce, namely, the Goodwill retail store located at 1239
University Avenue West, in St. Paul, Minnesota, all in violation of Title 18, United
States Code, Section 844(i).

COUNT 2

(Accessory After the Fact)

On or about May 28, 2020, through the present, in the State and District of
Minnesota and elsewhere, the defendant,

MENA D. YOUSIF,



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knowing that an offense against the United States had been committed, to wit, arson as set forth in Count 1, did receive, relieve, comfort, and assist the offender, Jose A. Felan, Jr., in order to hinder and prevent the offender's apprehension, trial, and punishment, all in violation of Title 18, United States Code, Section 3.

FORFEITURE ALLEGATIONS

If convicted of Count 1 of this Indictment, the defendant, **JOSE A. FELAN, JR.**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and pursuant to Title 18, United States Code, Section 844(c) and Title 28, United States Code, Section 2461(c), any explosive materials involved or used or intended to be used in the violation.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON